



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*50 Main Street, Suite 1100  
White Plains, New York 10606*

December 12, 2023

**BY ECF & E-MAIL**

Honorable Kenneth M. Karas  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

**Re: *United States v. Jason Sullivan, 16 Cr. 832 (KMK)***

Dear Judge Karas:

The Government respectfully submits this letter in advance of the sentencing scheduled for December 14, 2023 in the above-captioned matter to provide the Court with victim impact statements the Government has received. Pursuant to the Crime Victims' Rights Act, 18 U.S.C. 3771, the Government has informed the family members of Martin Luna, Urbano Santiago, Miguel Luna, and Hector Gutierrez of their right to be heard in connection with the defendant's sentencing. In response, the Government received two written submissions, each with accompanying attachments. First, Hector Gutierrez's wife, Endelia Gayton Chávez submitted a letter along with several identification documents. The Government has obtained a certified translation of Ms. Chávez's letter, which is enclosed with the remainder of her submission. Second, Martin Luna's daughter, Clara May Luna submitted a letter along with several videos of her father showing glimpses of the parent he was to her. That submission and its attachments are also enclosed.

The Government expects other members of the victims' families will attend sentencing in this matter and may request to address the Court orally at that time.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: 

Maurene Comey  
Jacob R. Fiddelman  
Assistant United States Attorneys  
(212) 637-2324

cc: Jason Ser, Esq. (by email)  
Richard Jasper, Esq. (by email)